

CORRES. CONTROL
OUTGOING LTR NO.

DOE ORDER# 4700.1

24 RF 11265

EG&G ROCKY FLATS

EG&G ROCKY FLATS, INC.
ROCKY FLATS PLANT, P.O. BOX 464, GOLDEN, COLORADO 80402-0464 • (303) 966-7000

DIST.	LTR	ENC
AMARAL, M.E.		
BURLINGAME, A.H.		
BUSBY, W.S.		
BRANCH, D.B.		
CARNIVAL, G.J.		
DAVIS, J.G.		
FERRERA, D.W.		
FRAY, R.E.		
GEIS, J.A.		
GLOVER, W.S.		
GOLAN, P.M.		
HANNI, B.J.		
HARMAN, L.K.		
HEALY, T.J.		
HEDAHL, T.		
HILBIG, J.G.		
HUTCHINS, N.M.		
JACKSON, D.T.		
KELL, R.E.		
KUESTER, A.W.		
MARX, G.E.		
MCDONALD, M.M.		
McKENNA, F.G.		
MONTROSE, J.K.		
MORGAN, R.V.		
POTTER, G.L.		
PIZZUTO, V.M.		
RISING, T.L.		
SANDLIN, N.B.		
SCHWARTZ, J.K.		
SETLOCK, G.H.		
STEWART, D.L.		
STIGER, S.G.	X	
TOBIN, P.M.		
VOORHEIS, G.M.		
WILSON, J.M.		
ROCKS, L.M.	X	
FLICKER, R.	X	
WARD, D.	X	
LEVIN, M.	X	
SIDERS, M.	X	
Hopkins, J.	X	
CORRES. CONTROL	X	X
ADMIN RECORD/0802	X	
TRAFFIC		
PATS/T130G		

CLASSIFICATION:

CON	
UNCLASSIFIED	
CONFIDENTIAL	
SECRET	

AUTHORIZED CLASSIFIER

SIGNATURE
DOCUMENT CLASSIFICATION
REVIEW WAIVER PER
CLASSIFICATION OFFICE
DATE

IN REPLY TO RFP CC NO:

4040-RF-94

ACTION ITEM STATUS

1 PARTIAL/OPEN
1 CLOSED

TR APPROVALS:

MCB: MB
ORIG & TYPIST INITIALS
ML: bjw

November 3, 1994

94-RF-11265

Jessie M. Roberson
Assistant Manager for
Environmental Restoration
DOE, RFFO

REQUEST FOR STANDARDS ATTAINABILITY ANALYSIS (10997) - SGS-586-94

We have received your letter requesting an analysis of the cost and feasibility of attaining both the Colorado Statewide and Colorado Site-specific standards for surface and groundwater at both the Indiana Street boundary and the Operable Unit (OU) boundaries. We feel that this analysis will be vital to a meaningful resolution of Applicable or Relevant and Appropriate Requirements (ARARS) issues with the regulatory agencies. A conceptual level response will be provided by the 11th of November. In order to prepare a detailed response, as will be required to justify a reasonable outcome in the ARARS negotiations process, additional time and resources must be allocated. A funding source must be identified and funds reallocated. We request your support in these efforts.

Additionally, it appears most critical to address the issue of relaxing the unnecessarily stringent site-specific surface and groundwater standards. This should begin with meetings with the cities of Broomfield, Westminster, and Arvada to explore the possibility of obtaining non-opposition in light of the DOE commitment to the Option B diversion project. The next step would then be to request that the Colorado Water Quality Control Commission schedule a hearing to consider the request for changes. Finally, we recommend that the basis for the requested changes in standards be founded primarily on the availability of a much broader understanding of the Rocky Flats Environmental Technology Site and a more extensive data set than the data set considered in the original and subsequent rulemakings. This would enable utilization of the Clean Water Act exemption to anti-backsliding on the basis of "standard set in error", rather than a direct challenge to state authority.

Please direct any questions to Mark Levin, Environmental Operations Management (EOM), Program Support, at extension 8580.

S. G. Stiger, Director
Environmental Restoration Program Division

MEL:bjw

Orig. and 1 cc - J. M. Roberson

cc:
M. N. Silverman